

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GREAT LAKES ACQUISITION CORP.)
d/b/a ELARA CARING,)

Plaintiff,)

v.)

Case No. 20-10781

PARADIGM LIVING CONCEPTS, LLC)
d/b/a PARADIGM HEALTH, AMY)
STONE and MITASHA OWENS,)

Hon. Bernard A. Friedman

Magistrate Judge Michael J. Hluchaniuk

Defendants.)

DECLARATION OF JEFF JARECKI

I, Jeff Jarecki, in accordance with 28 U.S.C. § 1746, state as follows:

1. I am a competent adult with personal knowledge of the matters stated in this declaration. The declaration is based upon my personal knowledge and review of certain business records of Paradigm. If called upon to testify under oath, my testimony would be the same as in this declaration.

2. I am the President and Chief Executive Officer of Paradigm Living Concepts, LLC d/b/a Paradigm Health (“Paradigm”). Paradigm is an Indiana limited liability company with its principal place of business in Indianapolis, Indiana. Paradigm provides home health, hospice and palliative care services in central Indiana and is licensed by the State of Indiana and accredited by the Accreditation Commission for HealthCare. I am a resident of Indiana.

3. Neither Amy Stone (“Stone”), nor Mitasha Owens (“Owens”), has shared any confidential information of Great Lakes Acquisition Corp. d/b/a Elara Caring (“GLC” or “Elara”) with me (or to my knowledge, anyone else at Paradigm), including information

regarding Elara's "CAREtinuum program" or its software systems, and I have never asked them for any such information.

4. Owens informed me in April 2020, after GLC filed this lawsuit, that she (while looking for a copy of her GLC employment agreement) found a binder of GLC/Elara Caring information or documents and some documents clipped to the back of her calendar. She did not share the documents or information with me and was instructed to tell Paradigm's attorney, Debra Mastrian. I understand that Owens made arrangements to give the binder and documents to Ms. Mastrian and that the binder and documents have been returned to GLC's attorneys. I have not seen the binder or documents and do not know the information contained in the binder or documents.

5. I have asked each of Paradigm's employees who used to work for GLC/Elara whether they had ever been asked by Paradigm's leadership for any GLC/Elara confidential information, including contact information of other employees, client information, marketing information, referral sources, patient lists, business plans, technology, pricing or cost information, margins, policies or protocols or Elara's CAREtinuum program. They each reported that they have never been asked for any such information.

6. Paradigm has conducted a reasonable search for any GLC/Elara confidential information, including a search of Paradigm's electronically stored information, and no confidential information of GLC/Elara was found.

I DECLARE, UNDER THE PENALTY OF PERJURY, THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT.

Dated: 5/18/2020



Jeff Jarecki